

3. Upon information and belief, at all material times, Defendant was and still is an entity duly organized and existing by virtue of foreign law with a principal place of business in British Virgin Islands.

4. By way of Forward Freight Agreements dated November 2, 2006, February 1, 2007 and March 21, 2007 (hereafter "FFA's"), all on the FFABA 2005 Contract, Defendant agreed to sell and buy freight futures with the Plaintiff.

5. The November 2, 2006 FFA provided for settlement dates of the last day of three contract months: January, February and March of 2007. The March 2007 settlement date provided that Defendant sustained a loss payable to Plaintiff in the sum of \$318,662.04.

6. Despite due demand for payment of the March 2007 settlement of the November 2, 2006 FFA, Defendant has failed to remit payment to Plaintiff in breach of the FFA.

7. The February 1, 2007 FFA provided for settlement dates of the last day of three contract months: April, May and June of 2007.

8. The March 21, 2007 FFA provided for settlement dates of the last day of three contract months: April, May and June of 2007.

9. On April 24, 2007 Plaintiff served on Defendant an Early Termination Notice for the February 1, 2007 and March 21, 2007 FFA contracts based upon the Defendant's event of default under the terms governing these FFA contracts.

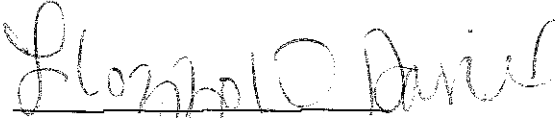
10. Pursuant to the terms governing the February 1, 2007 and March 21, 2007 FFA contracts, on or about April 26, 2007 the Plaintiff served on Defendant its Calculation of Losses based on the Early Termination of the FFA contracts. Plaintiff's Calculation of Losses informed Defendant that Plaintiff was due \$1,569,750 for these FFA contracts.

11. As a result of Source Link's breach of these FFA contracts Plaintiff has suffered a loss in the total principal sum of \$1,888,412, as best can now be estimated, exclusive of interest, recoverable costs and reasonable attorneys fees.

Dated: May 3, 2007
New York, NY

The Plaintiff,
PAN OCEANIC MARITIME, INC.

By:



Lauren C. Davies (LD 1980)

Kevin J. Lennon (KL 5072)

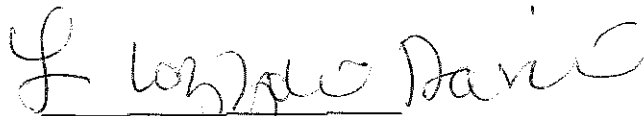
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ATTORNEY VERIFICATION

State of New York)
)
County of New York) ss: City of Manhattan

1. My name is Lauren C. Davies.
2. I am over 18 years of age, of sound mind, capable of making this Verification and fully competent to testify to all matters stated herein.
3. I am the attorney for the Plaintiff in this action. I am fully authorized to make this Verification on its behalf.
4. I have read the foregoing Second Amended Verified Complaint and the contents thereof are true and accurate to the best of my knowledge, information and belief.
5. The reason that this Verification was made by me and not the Plaintiff is that the Plaintiff is a corporation none of whose officers are present in this District.
6. The source of my knowledge is information and records furnished to me by the Plaintiff and its solicitors, all of which I believe to be true and accurate.

Dated: May 3, 2007
New York, NY



Lauren C. Davies